PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



June 17, 2008

VIA MAIL AND EMAIL

Susan Nelson, Project Manager Southern California Edison Company 2244 Walnut Grove Avenue Rosemead, CA 91770

SUBJECT: Data Request No. 1 for the San Joaquin Cross Valley Loop Project (A.08-05-039)

Dear Ms. Nelson:

As the California Public Utilities Commission (CPUC) proceeds with our review of Southern California Edison (SCE)'s Application and Proponent's Environmental Assessment (PEA) for the San Joaquin Cross Valley Loop Project, we have identified additional information required to complete our analysis of the Proposed Project. Please provide the information requested on the pages attached to this letter.

We would appreciate your prompt response to this data request by June 30, 2008, which will help us maintain our schedule for analysis and processing of this application. Please submit your response in hardcopy and electronic format to me and also directly to our environmental consultant, ESA, at the mail and e-mail addresses noted below. If you have any questions please direct them to me as soon as possible.

Sincerely,

Jensen Uchida

CPUC CEQA Project Manager

Energy Division

Phone: (415) 703-5484

JMU@cpuc.ca.gov

Environmental Science Associates

Attn: Doug Cover

1425 N. McDowell Blvd., Suite 105

Petaluma, CA 94954 dcover@esassoc.com

Data Request #1 San Joaquin Cross Valley Loop Project

General Request

- Please provide the native form versions (i.e., MS Word, Excel, etc. files) used to create all sections, graphics, and appendices of the PEA.
- Please provide the aerial photo base map digital file and the GIS shape files that were used to create the figures presented in the PEA.

Project Description

Existing System

- 3. Provide a schematic diagram and map of the existing system.
- Provide a schematic diagram that illustrates the system as it would be configured with implementation of the proposed project.

Proposed Project

- 5. The PEA PD does not provide the capacity increase in MW.
- 6. Provide GIS (or equivalent) data layers for the proposed project preliminary engineering including estimated locations of all physical components of the proposed project as well as those related to construction. For physical components, this could include but is not limited to the existing components (e.g., ROW, substation locations, poles, etc.) as well as the proposed pole locations, transmission lines, substations, etc. For elements related to construction include: proposed or likely lay-down areas, work areas at the pole sites, pull and tension sites, access roads (e.g., temporary, permanent, existing, etc), areas were special construction methods may need to be employed, areas where vegetation removal may occur, areas to be heavily graded, etc.

Proposed Components

Poles/Towers

7. Update Appendix D to note which poles would be angle poles.

Substations

- 8. Provide Plan and Profile views of the existing substations.
- 9. Provide "typical" Plan and Profile views of modified Rector, Springville, Vestal and Big Creek 3 Substations.

Right-of-Way Requirements

10. Identify the location of properties likely to require acquisition.

General Construction

Staging Areas

11. Where would the two main staging areas likely be located? Multiple locations for inclusion in the environmental review document would be fine to allow for options.

- a. Describe any site preparation required upon determining staging options. The PEA PD states that the staging areas "would be surfaced with crushed rock if existing surfacing is not compatible with storage and equipment requirement..." Would any additional site preparation be required?
- b. Describe how power to the staging areas would be provided, if required.
- Describe how the staging areas would be accessed (i.e., would existing roads or new access roads be required?).

Access Roads and/or Spur Roads

- For existing roads to be used, differentiate between unimproved and improved. Provide a description of the methodology of improvement.
 - a. Provide updated GIS shape file data to identify approximate locations of unimproved and improved access roads.

Helicopter Access

- 13. Update Appendix D to identify which proposed poles/towers would be removed and/or installed using a helicopter.
- 14. Describe flight paths, payloads, and hours of operations for known locations and work types. The PEA PD states that helicopters would be used for approximately 26 days for 6 hours per day, but does not provide hours and month(s) of operation.

Vegetation Clearance

- 15. Identify the preliminary location and provide an approximate area of disturbance in the GIS database for each type of vegetation removal.
- 16. Describe how each type of vegetation removal would be accomplished.
- 17. For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.
- 18. Describe the types of trees and approximate number and size of trees that may need to be removed. The PEA PD states that 21 acres of orchard vegetation would need to be cleared but does not describe the type or number and size of trees to be removed.

Transmission Line Construction (Above Ground)

Pole and Foundation Removal

19. If a hole is to be filled, what type of fill would be used, where would it come from?

- 20. Expand on description of any surface restoration that would occur at the pole sites. The PEA PD states (p. 3-16): "Holes would be filled and compacted and then the area would be smoothed to match surrounding grade." Please provide further details (i.e., topsoil would be stockpiled and re-spread, seeded with an appropriate seed mix, etc.).
- 21. Provide a general description of how poles/towers would be removed via helicopter, to include number of helicopter trips per structure.

Pole/Tower Installation

- 22. Provide a general description of how new poles/towers would be installed via helicopter, to include number of helicopter trips per structure.
- 23. Expand on description of what would be done with soil removed from a hole/foundation site. The PEA PD states (p.3-17) that the soil removed would "either be used by the property owner or disposed of off site." Please provide further information (i.e., could soil be stockpiled on the work area and be used to backfill the holes, or spread on the work area?; what type of offsite disposal would occur (reuse, landfill)?)

Conductor Installation

24. Provide locations of special crossing areas (i.e., roadways, stream crossing). What safety measures are necessary at these locations?

Substation Construction

- 25. Would construction of a new MEER at the Rector Substation require any earth moving activities? If so, what type of activity and, if applicable, estimate cubic yards of materials to be reused and/or removed from the site for both site grading and foundation excavation.
- 26. Provide a conceptual landscape plan in consultation with the municipality in which a substation is located.

Construction Schedule

27. Please provide an updated schedule that shows month, year and duration of construction activities. Analyst need to understand which activities could be occurring concurrently so a Gantt Chart would be most effective.

Operation and Maintenance

28. The PEA PD states that there would be aerial and ground inspections. Please describe when and why aerial inspections would be required.

Alternatives

- 29. Provide peak load capacity and peak demand forecasts in MW for Springville and Vestal Substations.
- 30. Provide load forecast data for the eastern leg BC3-Springfield and BC4-Springfield circuits to ascertain the underused capacity available on those circuits to both reinforce transmission to Rector and to supply future load growth on the eastern leg lines.

- 31. What is the direction of energy flow on the Rector-Vestal circuits? How much capacity is available to move more energy to Rector from the south?
- 32. Page 2-9, Section 2.2.1 of the PEA discusses line impedance as related to length as a major factor influencing the elimination of the Alternative 4 route from further consideration because the line length from BC3 to Rector would be greater than the other alternative routes. Please provide a table of line length vs. impedance and line capacity to properly evaluate this scenario.
- 33. The PEA in several places states that the new poles and towers will be designed so that in the future as need arises capacity can be further increased by reconductoring. Can the lines on the existing towers be upgraded to increase capacity now by reconductoring with larger conductors or double conductoring?

Environmental Impact Assessment

Air Quality

 Quantify construction and operational emissions of criteria pollutants and GHGs and provide detailed back-up calculations.

Biological Resources

- 35. The PEA states that surveys for wetlands would occur during the preconstruction Environmental Surveys for the proposed project to determine if they are present. This approach does not provide sufficient information on which to base the CEQA analysis. Provide conduct a wetland survey and provide a delineation map identifying potential jurisdictional waters of the U.S. and State.
- 36. Please provide copies of the reports related to the 11 surveys done in support of the biological resources section of the PEA from May 2005, June 2005, April 2006, May 2006, June 2006, February 2007, March 2007, November 2007, February 2008, and March, 2008. (PEA states 11 surveys, but only noted 10 dates).

Hazards and Hazardous Materials

37. Please provide a copy of the Phase I Environmental Site Assessment (ESA) that SCE conducted.

Hydrology and Water Quality

38. What types of drainage systems currently exist and what types would be installed at the substation sites that could require new foundations and/or other impervious surfaces? Would storm water be discharged to an offsite drainage system or would it discharge to pervious surfaces within the fence line of the sites?